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March 22, 2012

William J. Reilly, Jr. Office of Regional Counsel USEPA, Region II 290 Broadway, 17th Floor New York, NY 10007

Re: Riverside Avenue Site, Newark, Essex County, New Jersey Request for Information

Dear Mr. Reilly:

On behalf of Monson Companies, Inc., I enclose herewith our response to the Request for Information dated February 28, 2012, in the above matter.

Monson Companies is a full service chemical distributor. Monson Companies buys chemicals in bulk quantities and resells those chemicals to its customers.

As set forth in our response, we have no written documentation demonstrating any connection to the Riverside Avenue Site, or to any of the entities identified in the Request for Information. There are two Monson employees who believe that Monson did, many years ago, use something known to them as the "Frey Warehouse" for the short term storage of saleable products. That product was principally Glycerin USP, a non-hazardous material used in medical applications and as a food additive. After short term storage, that material would then be shipped to our customer.

We stress that there was no processing, treatment or disposal of any of the saleable commercial products; the relationship was for warehousing only. Therefore, we do not believe that Monson Companies is in any way related to, nor does it have any legal liability, for any release of hazardous substances that may have occurred at the Riverside Avenue Site.

Please feel free to contact me should you have any questions concerning our reply, and please direct any future communications concerning this matter to my attention.

Very truly yours,

Steven T. Singer, Esq

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Cc: Ms. Marissa Truono Mr. Stephen Barney

RESPONSE TO REQUEST FOR INFORMATION

RIVERSIDE AVENUE SITE, NEWARK, NEW JERSEY

ON BEHALF OF MONSON COMPANIES, INC.

- 1.a. Monson Companies Inc., 154 Pioneer Park, Leominster, Ma. 01453
- 1.b. Stephen Barney, President and Chief Executive Officer.
- 1.c. Monson Companies, Inc. is Delaware corporation, formed in 1987. Monson's registered agent in Delaware is Corporation Trust Company, Corporation Trust Center, 1209 Orange Street, Wilmington, Delaware 19801.
- 1.d. Monson Chemical, Inc. was formed in 1965. In 1987, Monson Chemical, Inc. was acquired by KODA Distribution Group, Inc., and become a wholly owned subsidiary of KODA Distribution Group, Inc. In 1998, Monson Chemical, Inc. was renamed Monson Companies, Inc. In 2010, KDG Acquisition Company, Inc., a wholly owned subsidiary of KDG Holdings, Inc., acquired 100% of the capital stock of KODA Distribution Group, Inc. Immediately following the consummation of the acquisition, KDG Acquisition Company, Inc. merged with and into KODA Distribution Group, Inc. As a result of the merger, KODA Distribution Group, Inc. became a direct, wholly owned subsidiary of KDG Holdings, Inc., and Monson Companies, Inc. became an indirect, wholly-owned subsidiary of KDG Holdings, Inc.
- 2.a. Monson has no direct knowledge of or any documents related to the entering into any contracts with any of the entities named in this Request or documents related to the storage of materials at the Site. In addition to the answers below, Monson further answers that it has interviewed two long-time employees who have knowledge of Monson storing products that were being sold to customers at what was known to them as the "Frey Warehouse." In other words, Monson used the Frey Warehouse as a public warehouse to store products before their direct sale to customers no processing or treatment or disposal of the products were performed at the warehouse. The employees' recollections were that many years ago, Monson stored small amounts of Glycerin USP, which is a non-hazardous material used for direct medical application and as a food additive and small amounts of other Monson products sold directly to customers, but they cannot recall which products they were.

2.a.1. No

2.a.2. No

2.a.3. No.

2.a.4. No.

2.a.5. No.
2.b.1. No.
2.b.2. No.
2.b.3. No.
2.b.4. No.
2.c.1. No.
2.c.2. No.
2.c.3. No.
2.c.4. No.
2.d.1. No.
2.d.2. No.
2.d.3. No.
2.d.4. Please see Monson's response to 2.a. above.
3.a. No.
3.b. No.
3.c. No.
3.c. No. 3.d. No.
3.d. No.
3.d. No. 3.e. No.
3.d. No. 3.e. No. 3.f. No.
3.d. No. 3.e. No. 3.f. No. 3.g. No. 4.a. No. 4.b. No.
3.d. No. 3.e. No. 3.f. No. 3.g. No. 4.a. No.

4.c. No.
5. Please see Monson's response to 2.a. above.
6. Steve Barney, Hal Chevalier, Chuck Holleman and Ed Fowler.
7.a. None.
7.b. None.
7.c. None.
7.d. None.
7.e. None.
7.f. None.
7.h. None.
7.i. None.

CERTIFICATION OF ANSWERS TO REQUEST FOR INFORMATION

State of MA

County of hbreester:

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document (response to EPA Request for Information) and all documents submitted herewith, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete, and that all documents submitted herewith are complete and authentic unless otherwise indicated. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment. I am also aware that I am under a continuing obligation to supplement my response to EPA's Request for Information if any additional information relevant to the matters addressed in EPA's Request for Information or my response thereto should become known or available to me.

Stephen P. Barney NAME (print or type)

Sworn to before me this day of March 21, 2012

Notary Public

Notary Public Janet Harnel Commonwealth of Messachusetts Commission Expires on Mar. 10, 2017 Steven T. Singer, Esq. 34 Hillside Avenue Montclair, NJ 07042

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